

Teleglobe America Inc.

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Certification of CPNI Filing (February 6, 2006) EB-06-TC-060 EB Docket No. 06-36

I, Michael C. Wu, hereby certify that I am an officer of Teleglobe America Inc. with (T) 703 766-3047 the title of Vice President and General Counsel; that I am authorized to execute this certification as an agent for Teleglobe America Inc.; and that based upon my personal knowledge, I certify that following Compliance Statement accurately describes operational procedures and policies implemented by Teleglobe America Inc. to ensure the privacy of its customers' Customer Proprietary Network Information ("CPNI") in compliance with the rules of the Federal Communications Commission set forth in 47 CFR §§ 62.2001 through 64.2009.

Michael C. Wu Vice President and General Counsel

Executed on: February 6, 2006

TELEGLOBE AMERICA INC.

STATEMENT OF CPNI COMPLIANCE PROCEDURES

As background, Teleglobe America Inc. ("Teleglobe America") is a member of the Teleglobe international group of operating companies, all of whom are intermediate (primarily international) wholesale carrier's carriers. As such, Teleglobe America does not market to wireline or wireless end-user customers.

Teleglobe America typically transports the "middle" segment only of a circuit-switched voice or Voice Over Internet Protocol ("VoIP") international (and a small number of interstate) calls. Teleglobe interconnects with U.S. interexchange carriers at the carrier hotel level (above the access tandem level) where traffic is handed off to Teleglobe America by its carrier customers, and then Teleglobe America transports that traffic to another interexchange carrier, usually overseas, for ultimate termination. Teleglobe America also transports traffic handed off to Teleglobe overseas by foreign carriers, into the U.S. Once the traffic is in the U.S., Teleglobe America hands off the traffic to a U.S. interexchange carrier (typically a U.S. carrier that, unlike Teleglobe America, is interconnected with local exchange carriers) for termination.

Teleglobe America does not use any CPNI in outbound marketing campaigns. Typically, new customers for intermediate segment voice transport service come to Teleglobe America, shopping for the best price for their international voice termination requirements. Teleglobe America first signs a Nondisclosure Agreement with the prospective carrier-customer and then markets to them using our price list for traffic termination destinations served. Any intermediate segment wholesale voice transport carrier prospects that Teleglobe America contacts (*i.e.*, that do not contact us first) are identified through public sources such as industry magazines. The only instance in which Teleglobe America may initiate contact with the customer using CPNI is for billing, maintenance and repair purposes, and to inquire about the customer's satisfaction with its existing services. Since Teleglobe America does not use any CPNI in outbound marketing campaigns, it therefore does not collect opt-in or opt-out authorizations from customers for such use.

Importantly, Teleglobe America personnel are not permitted to disclose any confidential customer information, including CPNI. All Teleglobe America personnel have certified in writing that they have read and will adhere to the Teleglobe Code of Business Conduct, which contains strict confidentiality requirements for all customer confidential information, including CPNI, and provides for disciplinary action for violation up to, and including, immediate termination of employment. Periodic training is conducted on the Code of Business Conduct, and records of such training are maintained by the Legal Department. Additionally, all new personnel at the time of hiring must sign an agreement on Confidential Information, Intellectual Property and Exclusivity Undertakings, which includes confidentiality requirements such as maintaining the confidentiality of customer information. Teleglobe America personnel who are authorized to access CPNI are trained in the authorized uses of this information.

Furthermore, Teleglobe does not share, sell, lease or otherwise provide CPNI to any of its affiliates, suppliers, vendors and any other third parties for the purposes of marketing any services. Sharing, selling, leasing or otherwise providing CPNI to any unrelated third parties,

other than for billing purposes, for the provision, maintenance and repair of services, to protect rights or property of the Company, or pursuant to legal process, is strictly prohibited by the Company.